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November 21, 2003

By Hand Delivery

Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

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NOV 21 2003

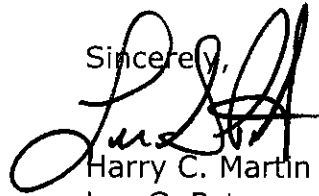
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Petition For Rulemaking
Terre Haute, Indiana - Channel 298A
Living Proof, Inc., Petitioner - FRN: 0006-2429-11

Dear Ms. Dortch:

Living Proof, Inc., by and through its attorneys, hereby submits this Petition for Rulemaking to reserve the above-reference vacant commercial FM allotment for noncommercial use. This Petition is being submitted in accordance with the Public Notice, dated September 30, 2003, requiring that such Petitions be submitted by November 21, 2003 (DA 03-2990).

Should there be any questions regarding this Petition, please contact undersigned counsel.

Sincerely,

Harry C. Martin
Lee G. Petro

Counsel for Living Proof, Inc.

Enclosures

cc: Ms. Rolanda F. Smith, Audio Division
Media Bureau - Room 2-B450

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List Attached
FM-MB
03-429

ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20554

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In the Matter of: }
 }
Amendment of Section 73.202(b), }
Table of Allotments, }
FM Broadcast Stations }
 }
(Terre Haute, Indiana) }

MB Docket No.:
RM-_____

NOV 21 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

TO: CHIEF, MEDIA BUREAU

PETITION FOR RULEMAKING

Living Proof, Inc. ("Living Proof"), by and through its attorneys, hereby submits this Petition for Rulemaking to reserve Channel 298A, Terre Haute, Indiana, for noncommercial use. This Petition is being submitted in response to the *Public Notice*²¹ establishing a filing window for reserving existing, vacant commercial FM allotments in accordance with the procedures set forth in the recently-adopted noncommercial FM reservation rules.²²

As discussed in more detail below, Channel 298A at Terre Haute, Indiana, can be reserved for noncommercial use under the procedures and standards set forth in the *Public Notice* and the *NCE Second Report and Order*. In particular, supporting this Petition is an engineering statement, attached hereto as Exhibit One, demonstrating that no reserved channel can be allotted to serve Terre Haute, and that the proposed reservation would provide significant second NCE service to the proposed primary service contour of the facility in excess of the 10% threshold

²¹ *Media Bureau Opens Window to Permit Noncommercial Educational Reservation Showings for Certain Vacant FM Allotments*, Public Notice, DA 03-2990 (rel. Sept. 30, 2003) (the "*Public Notice*").

²² *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Second Report and Order, 18 FCC Rcd 6691 (2003) ("*NCE Second Report and Order*").

established in the *NCE Second Report and Order*. Therefore, Living Proof respectfully submits that the reservation of Channel 298A at Terre Haute, Indiana, will be in the public interest.

I. BACKGROUND

In 1997, Congress granted authority to the Commission to hold auctions to resolve conflicts among mutually-exclusive new and major change applications.²³ In response, the Commission determined that NCE entities seeking nonreserved, commercial FM and Television channels would be required to participate in auctions.²⁴ However, before this rule came into effect, the U.S. Court of Appeals for the D.C. Circuit vacated the requirement for NCE entities to participate in auctions for nonreserved spectrum.²⁵

In response to the *NPR* decision, and based on the subsequent comments submitted in response to a *Second Further Notice of Proposed Rulemaking*²⁶, the Commission modified the process by which qualifying NCE entities could reserve noncommercial FM and TV spectrum for noncommercial educational use. Noting that a large number of FM allotments had been made prior to the modification of the noncommercial reservation rules, the Commission indicated that it would establish a window by which those allotments made prior to August 7, 2000, could be reserved, under certain circumstances.²⁷

²³ *Balanced Budget Act of 1997*, Pub. L. No. 105-33, Title III, 111 Stat. 251 (1997).

²⁴ *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Report and Order, 15 FCC Rcd 7386, 7429 (2000).

²⁵ *NPR v. FCC*, 254 F.3d 226, 229 (D.C.Cir. 2001).

²⁶ *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Second Further Notice of Proposed Rulemaking, 17 FCC Rcd 3833 (2002).

²⁷ *NCE Second Report and Order*, ¶ 39.

The Commission established a three-part test to reserve a commercial FM allotment. Specifically, the reservation proponent must demonstrate that:

- (1) maximum class facilities at the proposed allotment site would provide first or second NCE service to at least ten percent of the population within the proposed station's service area and that such population is at least 2000 persons;
- (2) no rule-compliant facility can be authorized at maximum antenna height above average terrain and with maximum effective radiated power on any reserved band channel at four equally-spaced locations with the predicted 60 dBu signal of the maximum same class facility centered on the proposed community of license; and
- (3) no same class rule-compliant facility can be authorized at minimum antenna HAAT and with minimum ERP on any reserved band channel at the city center coordinates for the community of license.²⁸

A "rule-compliant" facility would be one that would otherwise complies with the technical and spacing requirements for FM facilities, and that would not cause prohibited interference to existing television stations operating on Channel 6.²⁹ By satisfying these requirements, the proponent will have established that the vacant nonreserved FM allotment is qualified to be reserved solely for noncommercial, educational purposes. *Id.*

II. DISCUSSION

As shown in Exhibit One, Channel 298A qualifies for reservation under the Commission's rules. First, 27.92% (40,985 persons) of the population within the proposed service area will be receiving a second NCE service. This figure is substantially higher than the 10% population threshold established by the Commission.

²⁸ *Id.* at ¶ 35.

²⁹ 47 C.F.R. 73.202(1)(a)(i)

In addition, the Engineering Statement also demonstrates that there are no available reserved FM channels that can be utilized to provide NCE service to Terre Haute, Indiana. First, the Engineering Statement shows that a minimum Class A facility (0.1 kW at 30 meters height above average terrain ("HAAT")) can not be allotted on any reserved FM channel. Moreover, the Engineering Statement also shows that, among 4 equally-spaced points within the proposed 60 dBu contour, a maximum Class A facility (6.0 kW at 100 meters HAAT) could not be allotted on any reserved FM channel.

Therefore, it is clear from the Engineering Statement both that a rule-complaint reserved channel FM allotment can not be made at Terre Haute, and "that NCE service is in fact needed" at Terre Haute,³⁰ In light of this showing, Living Proof respectfully requests that the Commission amend the FM Table of Allotments for Channel 298A at Terre Haute as follows:

<u>Community, State</u>	<u>Current Channel No.</u>	<u>Proposed Channel No.</u>
Terre Haute, Indiana	298A	298A*

Living Proof, Inc., certifies that it will apply for the requested channel if allotted, and, if successful in obtaining the construction permit for the facility, will construct the station.

³⁰ *Id.* ¶ 33.

III. CONCLUSION

WHEREFORE, in light of the foregoing, Living Proof, Inc. respectfully requests that the Commission grant the petition for rulemaking and reserve Channel 298A at Terre Haute, Indiana for noncommercial use.

The reservation of the allotment would deliver 40,985 persons their second NCE service and would best serve the public interest.

Respectfully submitted,

LIVING PROOF, INC.

By: 

Harry C. Martin
Lee G. Petro

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Telephone - 703-812-0400
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Its Counsel

November 21, 2003

Engineering Statement
In response to MMB Window Closing November 21, 2003
Providing for Conversion of
Commercial Allotments to Noncommercial Allotments

Terre Haute, IN 298A

Robert Moore
November 19, 2003

Public Notice DA 03-2990¹ and Report and Order 18 FCC Rcd 6691² state that three distinct engineering criteria must be satisfied to qualify an allotment. These must demonstrate 1) need for an additional NCE service, 2) unsuitability of any NCE channel at the site at the proposed city of license and 3) unsuitability of any NCE channel at four points near the edge of the protected contour surrounding the city of license. These will be demonstrated in order.

1) Need for Additional NCE Service – NCE Second Report and Order ¶34

The graphic below illustrates the 60 dBu coverage of existing NCE authorizations (shown in black) that intersect the 60 dBu contour of the proposed allotment when it is evaluated at its allotment site (shown in red). The graphic demonstrates that 27.92 % (40,985 out of 146,771 people) of the population covered by the allotment would be newly served with first or second NCE service NCE programming by conversion of the channel to NCE status. Of these 0 % would receive their first NCE service (shown in red) and 27.92 % would receive their second NCE service (shown in green). The remaining population (shown in black) is already served by two NCE stations. This coverage significantly exceeds the 10% and 2,000 people specified in the R&O.

2) City of License Site – NCE Second Report and Order ¶35b

The city coordinates are given at <http://www.fcc.gov/mb/audio/bickel/atlas2.html> as TERRE HAUTE, IN Latitude: N 39 28 0 Longitude: W 87 24 49. A **minimum class A** facility (0.1 kW at 30 m HAAT) was evaluated at each NCE channel. The entries *IN* and *OUT* represent the incoming and outgoing contour overlap with each specified station, or spacing, as in FMCONT output, is given in km. Only negative results, indicating prohibited contour overlap or spacing violation, are displayed. The existence of even one negative value for a channel shows that that channel is not available at the specified site with the specified facilities. Note that all stations in the CDBS are included here, whether authorized or not, since most, if not all, are included in closed Mx groups, so there is no longer an opportunity for new entrants to file. This table shows that all the NCE channels are unavailable at this site for the specified facility.

3) Cardinal Sites – NCE Second Report and Order ¶35a

Availability was also evaluated at 27 km (28km class A class contour distance - 1 km) of from the city of license site at azimuths of 0, 90, 180 and 270 degrees. In these evaluations, a **class maximum facility** was utilized. The entries are interpreted as in 2). These tables show that no NCE channels are available at these sites for the specified facility.

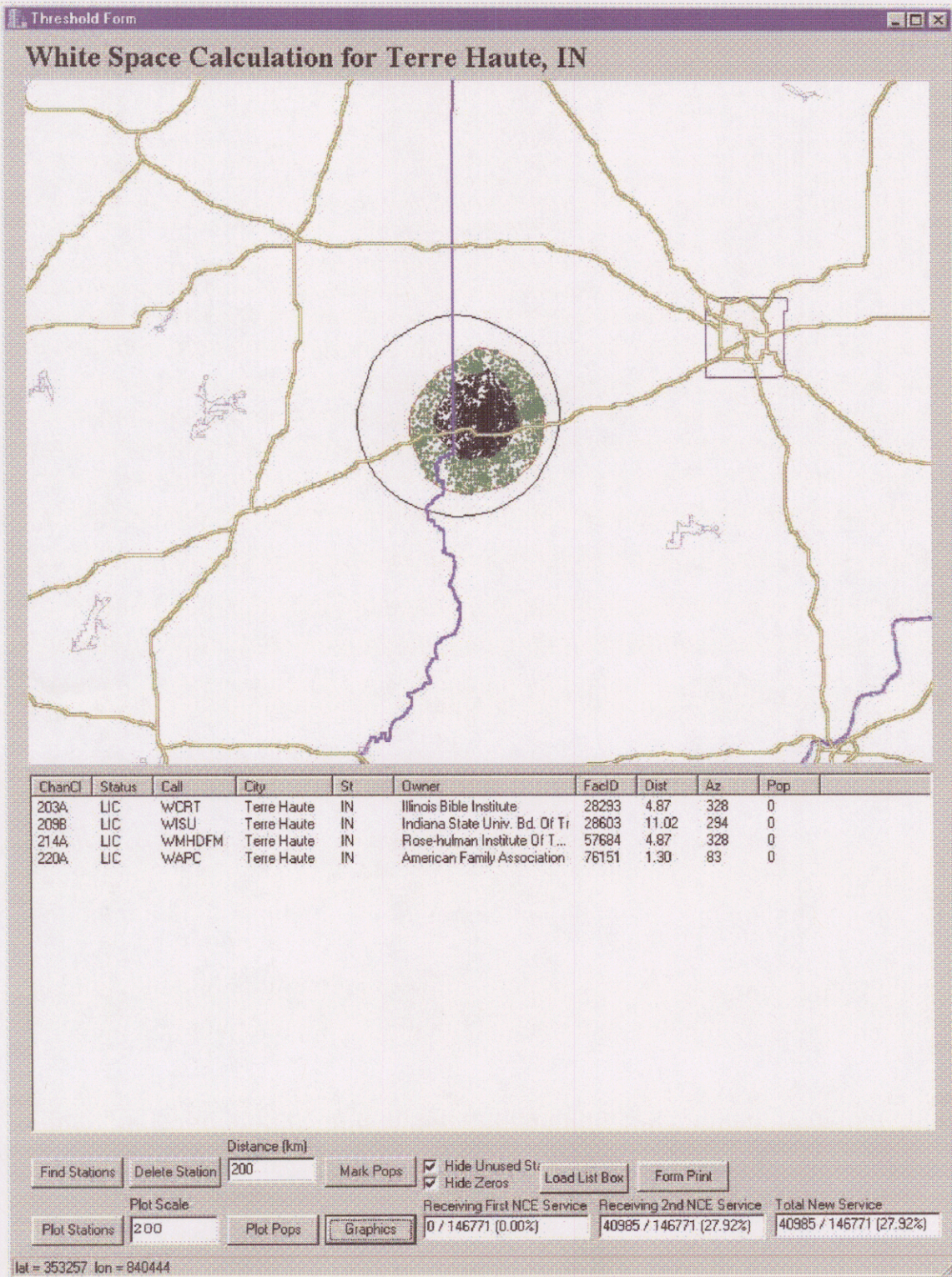
Conclusion:

The criterion specified by the Commission is satisfied by this allocation and it can be considered for conversion to an NCE allocation.

¹ *Media Bureau Opens Window to Permit Noncommercial Educational Reservation Showings for Certain Vacant FM Allotments*, Public Notice, DA 03-2990 (rel. Sept. 30, 2003) (the "Public Notice").

² *Reexamination of the Comparative Standards for Noncommercial Educational Applicants*, Second Report and Order, 18 FCC Rcd 6691 (2003) ("NCE Second Report and Order").

1) Need for Additional NCE Service



2) City of License Site

Showing of available NCE channels at Terre Haute, IN

Latitude 392800 Longitude 872449 ERP(Kw) 0.100 HAAT(m) 30 COR AMSL(m) 190

Chan	Call	*IN*	*OUT*	Margin
201	990311	-25.6		
	960905	-3.9		
	WCRT	-2.4	-15.3	
202	WCRT	-29.5	-22.6	
203	WCRT	-62.6	-33.2	
204	WCRT	-29.5	-22.6	
	WBHW.A	-1.8		
205	WCRT	-2.4	-15.3	
	WJCJ.C	-11.7		
	WEIU.C	-8.5		
	WEIU	-7.0		
206	WCRT	-2.4	-15.3	
	WSPM	-1.4		
	WVJC	-19.2		
	WISU		-33.3	
207	WYTJ	-15.3		
	WGNJ.C	-32.8		
	WGNJ	-12.6		
	WISU		-33.3	
208	WISU	-59.0	-40.6	
209	WISU	-106.8	-51.2	
210	WISU	-59.0	-40.6	
211	WISU		-33.3	
	WMHDFM	-2.5	-13.8	
212	WISU		-33.3	
	WFOF	-35.6		
	WUSI	-36.7		
	WMHDFM	-2.5	-13.8	
213	WSPV.A	-23.8		
	WSPV.A	-23.8		
	WSPV.A	-23.8		
	WMHDFM	-27.2	-21.1	
214	WMHDFM	-61.3	-31.7	
215	WMHDFM	-27.2	-21.1	
	WCJL.C	-23.2		
	WILLFM	-50.4		
216	WMHDFM	-2.5	-13.8	
	WVUB	-53.8		
217	WMHDFM	-2.5	-13.8	
	WAPC	-6.5	-9.5	
218	WGRE	-7.4		
	WLHW.C	-34.1		
	WAPC	-6.5	-9.5	
219	WBGL	-26.2		
	WAPC	-18.4	-16.8	
220	WAPC	-39.5	-27.3	

3) Cardinal Sites:

0 degrees:

Showing of available NCE channels at Terre Haute, IN

Latitude 394235 Longitude 872449 ERP(Kw) 6.000 HAAT(m) 100 COR AMSL(m) 275

Chan	Call	*IN*	*OUT*	Margin	Chan	Call	*IN*	*OUT*	Margin
201	990311	-61.6	-62.2		213	WFOF	-33.3	-28.6	
	960905	-9.4	-33.6			WSPV.A	-51.7	-54.6	
	960905	-21.6	-34.0			WSPV.C	-28.0	-44.0	
	981203		-0.8			WSPV.A	-51.7	-54.6	
	WCRT	-5.7				WSPV.A	-51.7	-54.6	
202	990311	-19.9	-19.0			WMHDFM	-27.6	-35.5	
	990311	-8.7	-8.7		214	WSPV.A	-11.3	-11.7	
	981203	-40.9	-44.3			WSPV.C		-1.1	
	WCRT	-17.5	-29.3			WSPV.A	-11.3	-11.7	
	980602	-13.3	-22.5			WSPV.A	-11.3	-11.7	
203	981203		-0.8			WMHDFM	-59.6	-78.4	
	WCRT	-34.7	-72.3			WQSG.C	-26.9	-16.6	
	980602	-43.2	-65.2			WILLFM	-15.4		
	AP203		-2.5		215	WMHDFM	-27.6	-35.5	
204	WCRT	-17.5	-29.3			WCJL.C	-37.1	-29.8	
	980602	-13.3	-22.5			WILLFM	-83.0	-41.0	
	WBHW.A	-1.3	-3.2		216	WMHDFM	-6.6		
	WICR	-26.8	-21.5			WILLFM	-15.4		
	WPCD	-28.6	-22.8			WVUB	-49.5	-22.5	
205	WCRT	-5.7				WIRE		-8.8	
	WJCJ.C	-60.2	-32.7			WNDY	-1.8	-8.7	
	WEIU.C	-30.2	-36.1		217	WMHDFM	-6.6		
	WEIU	-28.8	-35.4			WFHB		-0.4	
	WSPM		-3.2			WNDY	-39.0	-51.4	
206	WCRT	-5.7				WJCZ.C	-21.7	-13.4	
	WSPM	-30.6	-46.1			WGRE	-2.4	-11.5	
	WVJC	-14.0				WAPC	-6.3		
	WGNJ.C	-33.0	-23.9		218	WNDY	-1.8	-8.7	
	WGNJ	-12.0	-10.1			WGRE	-31.0	-54.2	
	WISU	-6.7	-17.7			WFWR		-32.7	
207	WSPM		-3.2			WFWR.A		-30.6	
	WYTJ	-13.4	-35.5			WLHW.C	-40.7	-42.6	
	WGNJ.C	-90.4	-67.7			WBGL	-14.5	-7.1	
	970606		-9.5			WAPC	-6.3		
	WGNJ	-54.8	-53.9		219	WGRE	-2.4	-11.5	
	WISU	-6.7	-17.7			WBGL	-65.8	-50.7	
208	WGNJ.C	-33.0	-23.9			WAPC	-21.7	-32.7	
	WGNJ	-12.0	-10.1		220	WBGL	-14.5	-7.1	
	WWTS.C	-16.8	-6.3			990506	-13.1	-18.1	
	WISU	-62.0	-57.2			WAPC	-47.5	-75.5	
209	WISU	-109.7	-100.5			980918	-2.1	-18.0	
210	WISU	-62.0	-57.2			990510	-25.7	-25.9	
	WHPL	-17.8	-30.6			WJEF		-6.7	
	AP210		-15.5			990420	-12.6	-14.7	
	WLKL		-11.2			980817	-31.7	-31.5	
211	WISU	-6.7	-17.7						
	WFYIFM	-24.6	-18.1						
	WEFT	-16.2	-17.9						
	WFOF	-33.3	-28.6						
	WMHDFM	-6.6							
212	WISU	-6.7	-17.7						
	WFOF	-84.0	-71.7						
	WUSI	-34.7	-16.8						
	WSPV.A	-11.3	-11.7						
	WSPV.C		-1.1						
	WSPV.A	-11.3	-11.7						
	WSPV.A	-11.3	-11.7						
	WMHDFM	-6.6							

90 degrees:

Showing of available NCE channels at Terre Haute, IN

Latitude	392800	Longitude	870560	ERP(Kw)	6.000	HAAT(m)	100	COR	AMSL(m)	275
Chan	Call	*IN*	*OUT*	Margin						
201	990311	-61.6	-64.2					WFOF	-49.7	-37.0
	WMBL		-13.5					970403	-21.3	-25.1
	960905		-21.1					WUSI	-36.1	-17.9
	960905		-7.6					WSPV.A	-29.1	-26.6
202	990311	-21.3	-19.7					WSPV.C	-7.3	-12.6
	WNINFM	-2.1						WSPV.A	-29.1	-26.6
	990310	-8.9	-16.3					WSPV.A	-29.1	-26.6
	990311	-33.2	-32.1		213			WSPV.A	-70.5	-70.8
	980716		-14.2					WSPV.C	-38.7	-56.8
	981203	-3.6	-7.7					WSPV.A	-70.5	-70.8
	WCRT	-24.9	-30.5					WSPV.A	-70.5	-70.8
203	WCRT	-57.9	-73.9					WMHDEM	-22.1	-28.6
	980602	-3.0	-28.8		214			WSPV.A	-29.1	-26.6
204	WCRT	-24.9	-30.5					WSPV.C	-7.3	-12.6
	WBHW.A	-25.5	-26.6					WSPV.A	-29.1	-26.6
	WBHW		-13.5					WSPV.A	-29.1	-26.6
	WBHW.A	-21.9	-20.6					WMHDEM	-55.6	-72.0
	WICR	-40.5	-34.3					WQSG.C	-14.0	-2.5
	WBHW.A	-21.2	-23.6					WCJL.C	-19.3	-15.6
	WBHW.A	-21.2	-23.6		215			WMHDEM	-22.1	-28.6
	WBHW.A	-21.9	-20.6					WBDG		-12.6
205	WJCJ.C	-27.6						WCJL.C	-66.4	-59.7
	WXVW.C	-32.7	-30.1					WILLEM	-47.8	-5.8
	WEIU.C	-2.2	-10.5					WVUB	-10.9	-1.0
	WEIU	-0.3	-9.1		216			WCJL.C	-19.3	-15.6
	WSPM	-12.8	-16.4					WVUB	-70.5	-43.7
206	WSPM	-45.9	-60.6					WIRE	-5.0	-14.0
	WVJC	-32.4	-5.1		217			WVUB	-10.9	-1.0
	WYTJ	-12.7	-20.6					WFHB	-15.3	-33.8
	WISU		-8.8					WNDY	-18.4	-31.0
207	WSPM	-12.8	-16.4					WGRE	-21.3	-26.9
	WYTJ	-44.6	-63.3					WAPC	-2.8	
	WGNJ.C	-53.2	-30.8		218			WGRE	-52.2	-71.0
	WGNJ	-17.6	-17.0					WFWR		-0.3
	WISU		-8.8					WLHW.C	-29.0	-30.3
208	WYTJ	-12.7	-20.6					WAPC	-2.8	
	WFCI		-15.7		219			WGRE	-21.3	-26.9
	WISU	-53.7	-47.7					WBGL	-28.3	-13.4
209	WISU	-101.6	-91.0					WAPC	-14.7	-25.0
	AP210		-6.3					WTTS		-0.4
210	WISU	-53.7	-47.7		220			990506	-18.7	-20.5
	WATI.A		-8.1					WAPC	-35.8	-68.6
	WHPL		-6.6					980918	-5.3	-20.7
	AP210	-21.9	-50.1					990510	-28.7	-28.2
	WATI		-8.1					990420	-13.6	-15.3
211	WISU		-8.8					980817	-34.2	-33.4
	AP210		-6.3					WTTS		-0.4
	WFYIFM	-38.6	-31.3							
212	WISU		-8.8							

Showing of available NCE channels at Terre Haute, IN

Latitude 391324 Longitude 872449 ERP(Kw) 6.000 HAAT(m) 100 COR AMSL(m) 262

Chan	Call	*IN*	*OUT*	Margin				
201	990311	-24.5	-27.5			WISU	-0.1	-13.4
	WMBL	-3.0	-16.3		208	WYTJ	-30.4	-37.6
	960905	-31.6	-53.7			WKPB	-6.6	
	960905	-17.9	-33.4			WISU	-60.1	-54.9
	WPTH		-20.3		209	WYTJ	-5.9	
202	960905	-1.9	-11.0			WISU	-108.0	-97.8
	WNINFM	-30.1	-4.5		210	WYTJ	-5.9	
	WNINFM	-16.4	-1.0			WISU	-60.1	-54.9
	990311	-7.0	-6.8			WATI.A	-8.3	-39.9
	WJLY	-8.1				AP210	-8.8	-36.3
	WCRT	-25.0	-31.5			WATI	-8.2	-39.9
203	WCRT	-57.3	-74.4			WLKL		-17.0
	980602		-7.0		211	WISU	-0.1	-13.4
	WBHW.A	-10.0	-9.4			WFYIFM	-2.3	
	WBHW.A	-5.8	-4.5			WUSI	-24.0	-17.5
	WBHW.A	-5.7	-5.7		212	WISU	-0.1	-13.4
	WBHW.A	-5.7	-5.7			WFOF	-30.1	-17.9
	WBHW.A	-5.8	-4.5			970403	-16.8	-13.7
204	WCRT	-25.0	-31.5			WUSI	-77.4	-60.2
	WBHW.A	-51.4	-52.2		213	WUSI	-24.0	-17.5
	WBHW	-20.8	-34.0			WSPV.A	-35.3	-35.1
	WBHW.A	-48.6	-47.2			WSPV.C	-4.5	-21.2
	WICR	-4.1				WSPV.A	-35.3	-35.1
	WBHW.A	-46.6	-48.5			WSPV.A	-35.3	-35.1
	WBHW.A	-46.6	-48.5			WMHDEM	-24.4	-31.1
	WBHW.A	-48.6	-47.2		214	WMHDEM	-58.7	-74.1
	WYTJ	-5.9			215	WMHDEM	-24.4	-31.1
205	WBHW.A	-10.0	-9.4			WCJL.C	-46.1	-37.7
	WBHW.A	-5.8	-4.5			WILLFM	-58.4	-17.2
	WBHW.A	-5.7	-5.7			WVUB	-43.7	-33.4
	WBHW.A	-5.7	-5.7		216	WVUB	-103.3	-76.2
	WBHW.A	-5.8	-4.5		217	WVUB	-43.7	-33.4
	WJCJ.C	-6.5				WFHB		-25.4
	WXVW.C	-17.4	-17.5			WNDY		-1.0
	WEIU.C	-28.7	-36.6			WLHW.C	-16.5	-20.4
	WEIU	-26.0	-34.9			WAPC	-2.7	
	WVJC	-5.9			218	WGRE	-14.6	-33.5
	WYTJ	-5.9				WLHW.C	-61.3	-63.1
206	WSPM	-9.5	-24.1			WAPC	-2.7	
	WVJC	-66.8	-39.3		219	WLHW.C	-16.5	-20.4
	WYTJ	-30.4	-37.6			960116		-4.2
	WISU	-0.1	-13.4			WBGL	-26.8	-12.4
207	WVJC	-5.9				WAPC	-14.7	-25.8
	WYTJ	-62.9	-80.5		220	WAPC	-36.2	-68.9
	WGNJ.C	-32.3	-20.4			WZDM	-12.4	-13.1
	970606	-2.1	-30.5					-12.1
	WGNJ	-11.6	-11.7					

270 degrees:

Showing of available NCE channels at Terre Haute, IN

Latitude 392800		Longitude 874338		ERP(Kw) 6.000	HAAT(m) 100	COR AMSL(m) 290		
Chan	Call	*IN*	*OUT*	Margin				
201	990311	-26.1	-28.8		210	WISU	-72.9	-69.3
	960905	-47.4	-71.5			WATI.A		-10.3
	960905	-47.1	-62.5			AP210		-9.6
	WPTH		-11.4			WATI		-10.3
	WCRT	-6.3				WLKL	-22.3	-42.9
202	960905	-19.6	-28.4		211	WISU	-16.6	-25.9
	960905	-11.9	-19.2			WEFT	-25.0	-19.8
	WNINFM	-0.9				WFOF	-0.0	
	WJLY	-27.5	-9.4			WUSI	-19.6	-12.9
	981203	-19.5	-22.1			WMHDFM	-7.3	
	WCRT	-18.9	-31.5		212	WISU	-16.6	-25.9
203	960905	-2.4				WFOF	-51.1	-38.2
	WCRT	-37.2	-74.2			WUSI	-73.1	-55.6
	980602	-6.8	-26.6			WMHDFM	-7.3	
204	960905	-2.4			213	WFOF	-0.0	
	WCRT	-18.9	-31.5			WUSI	-19.6	-12.9
	WBHW.A	-17.6	-18.7			WSPV.A	-23.6	-26.7
	WBHW.A	-15.1	-13.9			WSPV.C		-13.2
	WBHW.A	-12.7	-14.9			WSPV.A	-23.6	-26.7
	WBHW.A	-12.7	-14.9			WSPV.A	-23.6	-26.7
	WBHW.A	-15.1	-13.9			WMHDFM	-29.5	-38.1
	WPCD	-24.4	-18.4		214	WMHDFM	-62.4	-80.8
	WEIU.C	-15.0	-22.0			WILLFM	-25.4	-7.1
	WEIU	-14.1	-20.6		215	WMHDFM	-29.5	-38.1
205	WCRT	-6.3				WCJL.C	-22.8	-15.4
	WJCJ.C	-21.1	-0.5			WILLFM	-93.0	-50.8
	WEIU.C	-57.1	-65.3			WVUB	-15.6	-5.3
	WEIU	-55.2	-63.9			WLHW.C	-2.4	
206	WCRT	-6.3			216	WMHDFM	-7.3	
	WEIU.C	-15.0	-22.0			WILLFM	-25.4	-7.1
	WEIU	-14.1	-20.6			WVUB	-75.1	-48.0
	WSPM	-1.7	-17.7			WLHW.C	-2.4	
	WVJC	-46.3	-19.3		217	WMHDFM	-7.3	
	WYTJ		-3.6			WVUB	-15.6	-5.3
	WGNJ.C	-9.4	-4.4			WNDY	-0.3	-12.0
	970606		-4.6			WJCZ.C	-16.3	
	WGNJ	-0.1				WLHW.C	-33.2	-37.5
	WISU	-16.6	-25.9			WAPC	-4.4	
207	WYTJ	-27.9	-46.4		218	WGRE	-6.0	-27.4
	WGNJ.C	-57.0	-48.2			WLHW.C	-78.6	-80.5
	970606	-20.0	-47.6			WBGL	-8.3	-0.4
	WGNJ	-42.9	-42.0			WAPC	-4.4	
	WISU	-16.6	-25.9		219	WLHW.C	-33.2	-37.5
208	WYTJ		-3.6			WBGL	-59.6	-44.3
	WGNJ.C	-9.4	-4.4			WAPC	-16.3	-28.7
	970606		-4.6		220	WLHW.C	-2.4	
	WGNJ	-0.1				WBGL	-8.3	-0.4
	990304		-16.8			WAPC	-37.4	-71.4
	980810		-15.9			WUIS	-12.3	
	990304		-15.8			WWGO	-17.1	-15.7
	WISU	-72.9	-69.3					-17.5
209	WISU	-120.6	-112.0					